

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CASE NO.: 23-51139-cag
	§	
6 TO 9 DENTAL TEXAS, PLLC,	§	
	§	CHAPTER 11
DEBTOR.	§	
/	§	

**RESPONSE TO DEBTOR’S EMERGENCY MOTION FOR INTERIM AND FINAL
AUTHORITY TO USE CASH COLLATERAL AND GRANTING RELATED RELIEF**

TO ALL PARTIES IN INTEREST AND TO THEIR ATTORNEYS OF RECORD:

1. Live Oak Banking Company, (“Secured Creditor”) hereby submits its Response to the Emergency Motion for Interim and Final Authority to Use Cash Collateral and Granting Related Relief, filed by 6 to 9 Dental Texas, PLLC, (“Debtor”) to preserve its rights and does not waive any defenses not yet discovered or pled.
2. On or about April 19, 2018, Debtor executed a Loan Agreement encumbering all accounts, inventory, instruments, chattel paper, furniture, equipment, and general intangibles in of Debtor and 6 to 9 Dental, PLLC in the amount of \$975,000.00.
3. On August 29, 2023, Debtor filed the current Chapter 11 bankruptcy case.
4. The Debtor filed the Emergency Motion for Interim and Final Authority to Use Cash Collateral on August 30, 2023.
5. Secured Creditor opposes the Motion as same does not include an Exhibit A which is the budget. Secured Creditor is unable to evaluate the Motion without the Exhibit.
6. Secured Creditor hereby requests additional time in which to resolve the issues set forth above.

Wherefore, Secured Creditor hereby requests that the hearing be continued to allow the parties to resolve the issues.

Respectfully submitted,

/s/ Kristin A. Zilberstein

Kristin A. Zilberstein, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2023, I caused a true and correct copy of the foregoing to be served either by CM/ECF notice to those so authorized, and first-class mail as indicated to the parties reflected on the below or attached list.

/s/ Gina L. DeAngelo
Gina L. DeAngelo

Debtor

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